Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
)	
)	
Petition for Waiver of Rules Requiring)	GN Docket No. 15-178
Support of TTY Technology)	
)	

VERIZON PETITION FOR WAIVER

Verizon requests a waiver of any applicable TTY-related requirements for its IP-enabled wireless services identical to and subject to the same conditions as the waiver recently granted to AT&T.¹ In the *AT&T Waiver Order*, the Commission granted AT&T a waiver, but also specifically invited "requests from similarly situated providers seeking a similar waiver of the TTY requirements." Thus, pursuant to Section 1.3 of the Commission's rules, 47 C.F.R. § 1.3, Verizon requests prompt approval of the same conditional waiver of sections 6.5, 7.5, 14.20, 20.18(c), and 64.603 of the Commission's rules "and any other Commission rules that require support of TTY technology as an accessible solution for VoIP networks," subject to the same customer notification, progress reporting, and duration conditions.³

¹ Petition for Waiver of Rules Requiring Support of TTY Technology, GN Docket No. 15-178, Order, DA 15-1141 (Oct. 6, 2015) ("AT&T Waiver Order").

 $^{^{2}}$ *Id.* ¶ 22.

³ *Id.* ¶¶ 18-21, 25-26.

I. THE COMMISSION SHOULD GRANT VERIZON THE SAME RELIEF AFFORDED TO AT&T

The Commission should grant Verizon the same waiver relief under the rules that it granted to AT&T.⁴ Verizon is a nationwide provider of wireless services with over 103 million retail post-paid connections.⁵ Verizon also offers IP-based advanced calling services that enable VoIP calling and other advanced features, including video calling, that hold great potential for the usability of IP-enabled wireless services and devices for the deaf and hard-of-hearing.⁶

As the Commission and others have recognized, however, wireless IP networks do not reliably transmit TTY signals.⁷ Given that TTY support is not achievable for IP-enabled wireless services,⁸ Verizon has initiated its own effort to develop and deploy successor real-time text (RTT) technology for Verizon customers and services migrating away from digital CMRS networks and services to IP-enabled services and networks that support services and features like

⁴ Although it is Verizon's position that neither the existing rules nor the *AT&T Waiver Order* require such a waiver for a provider of IP-enabled wireless voice services, out of an abundance of caution in light of the recent *AT&T Waiver Order*, Verizon conditionally seeks the same relief afforded to AT&T.

⁵ Verizon 2015 2Q Investor Quarterly at 3, 5 (July 21, 2015), http://www.verizon.com/about/file/7841/download?token=WSzoUgD7.

⁶ Verizon, *Introducing HD Voice and Video Calling*, http://www.verizonwireless.com/landingpages/advanced-calling/; AccessWireless.Org , *People Who Are Deaf or Hard of Hearing*, http://www.accesswireless.org/Disability-Categories/Hearing.aspx (describing video conferencing capabilities).

⁷ AT&T Waiver Order ¶ 9 ("there are major technical barriers to reliably supporting TTY transmissions over IP networks"); Consumer Groups Comments at 8 ("[t]he Consumer Groups recognize that TTY, a technology developed well before the advent of IP-based communications networks, can be unreliable or even nonfunctional when used on an IP platform"); *see also* 47 C.F.R. § 1.925(b)(3) (waiver of Rules is warranted if strict application is "unduly burdensome or contrary to the public interest, or [there is] no reasonable alternative").

⁸ See 47 C.F.R. §§ 6.5(b), 14.20(a)(2)-(3) (rules apply to the extent readily achievable or achievable, respectively).

VoLTE and Voice over Wi-Fi. However, it will take time to develop and deploy RTT technology. Verizon plans to deploy RTT as a successor technology to TTY since, unlike TTY, RTT will work reliably in an IP environment. Verizon also supports a review of Commission rules to ensure that the rules will accommodate a smooth transition. Verizon is committed to develop and deploy during the waiver period RTT technology that will be accessible, interoperable with other RTT services and applications, and compatible with other providers' networks and users that may continue to rely on TTY technology in the future.

Verizon plans to meet the same conditions enumerated in the *AT&T Waiver Order*. Specifically, Verizon agrees to inform its customers through multiple channels that TTY is not supported on these services for calls to 911 and inform customers of alternative means to reach 911 services. Verizon will also inform the Commission and customers of its progress toward the deployment of RTT as described in the *AT&T Waiver Order*. And Verizon is seeking a waiver for the same duration as that granted to AT&T. Because Verizon is seeking a waiver identical to the waiver granted to AT&T and committing to the same conditions that were fully considered by the Commission on a well-developed record, there is no need for the Commission to seek additional public comment here and the Commission should promptly grant this petition.

⁹ See Verizon Comments at 1-2.

 $^{^{10}}$ AT&T Waiver Order ¶ 18.

¹¹ *Id*. ¶ 19.

¹² *Id*. ¶¶ 20-21.

II. CONCLUSION

The Commission should promptly grant Verizon the same waiver relief of its TTY-related rules previously afforded to AT&T.

Respectfully submitted,

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